

MARCUS LEE (Nevada Bar No. 15769)
MARCUS B. SMITH (Nevada Bar No. 12098)
LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
Telephone: 702.893.3383
Facsimile: 702.893.3789
Marcus.Lee@lewisbrisbois.com
Marcus.Smith@lewisbrisbois.com

*Attorneys for National Association of State
Workforce Agencies and Center for Employment
Security Education and Research*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Tsang, Donna,

Plaintiff,

vs.

Experian Information Solutions, Inc.;
JPMorgan Chase Bank, N.A.; Merrick Bank
Corporation; MRS BP, LLC dba MRS
Associates; Fair Square Financial Group, LLC
dba Ollo Card Services; Premiere Bankcard,
LLC; Colorado Department of Labor and
Employment; The Ohio Department of Job and
Family Services; Center for Employment
Security Education and Research; Credit One
Bank, N.A.; U.S. Small Business
Administration Office of Disaster Assistance;
and Equifax Information Services, LLC;

Defendant.

Case No. 2:22-cv-00572-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

Pursuant to LR IA 6-1, Defendant Center for Employment Security Education and Research, by and through its attorneys, Marcus Lee, Esq. and Marcus Smith, Esq. of Lewis Brisbois Bisgaard & Smith, LLP, and Plaintiff Donna Tsang, by and through her attorney Gerardo Avalos of Freedom Law Firm, hereby submit this Stipulation to Extend Time to Respond to Complaint.

///

1 Plaintiff served the Complaint on April 11, 2022, and, as such, the deadline to respond to
2 the Complaint is May 2, 2022.

3 The parties hereby stipulate that the deadline for Defendant to respond to the Complaint
4 will be extended by two weeks from May 2, 2022, to **May 16, 2022**.

5 This is Defendant and Plaintiff's first request to extend this deadline, which is made in good
6 faith and not for purposes of delay. The parties are attempting to resolve this matter and are
7 interested in conserving resources for settlement purposes.

8 DATED this 28th day of April, 2022.

DATED this 28th day of April, 2022

10 Albright Stoddard Warnick & Albright

Lewis Brisbois Bisgaard & Smith LLP

11 /s/ *Gerardo Avalos*

/s/ *Marcus Lee*

12 By: _____

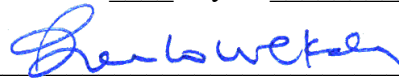
By: _____

13 Gerardo Avalos
14 Freedom Law Firm
15 8985 S. Eastern Ave, Suite 350
16 Las Vegas, NV 89123
17 *Attorneys for Defendant*

Marcus Lee
Nevada Bar No. 15769
Marcus B. Smith
Nevada Bar No. 12098
LEWIS BRISBOIS BISGAARD &
SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
Attorneys for Plaintiff

21 **IT IS SO ORDERED:**

22 Dated this 29th day of April 2022.

23 

24 United States Magistrate Judge